

**DECLARATION AND ENGINEERING STATEMENT
OF THOMAS RINGER**

1. I am a corporate engineer for Prettyman Broadcasting Company ("Prettyman"), licensee of Radio Station WICO-FM, Salisbury, Maryland. I have served in that capacity since October 9, 1989.

2. Since the fall of 1991, Mr. Charles W. Adams, Jr., president of C.W.A. Broadcasting, Inc. ("CWA"), has contacted me on at least two occasions soliciting information about Prettyman's anticipated expenses associated with changing Station WICO-FM's frequency of operation from Channel 232A to Channel 248A. Specifically, Mr. Adams requested an estimate of the total expenses for which CWA would have to reimburse Prettyman.

3. Initially, I gave Mr. Adams a guesstimate of the expenses. Mr. Adams, surprised at the size of the figure, then requested a more definitive itemized estimate. In response to Mr. Adams request, several employees of Prettyman, along with the input of Mr. William E. Prettyman, Jr., Prettyman's president, researched and compiled the pertinent information.

4. I telephoned Mr. Adams to provide him with the information. Mr. Adams indicated his continued uneasiness about the figure and asked that several of the included costs be changed. From the suggested changes and our subsequent conversations about the channel change expenses, it became clear that CWA wanted Prettyman to make limited expenditures leading up to the channel change so that the costs associated with the replacement of certain items would be minimal. In fact, Mr.

Adams explicitly asked me to keep down the costs on any items relevant to the channel change.

5. On another occasion in 1992, Mr. Adams telephoned me and asked for my assistance in locating either a tower sight or tower space for CWA's Cambridge station to be operated on Channel 232A. I provided Mr. Adams with the names and telephone numbers of the contact persons for several existing towers in the area. Mr. Adams also requested that I make an introductory telephone call to these persons on CWA's behalf in order to facilitate his negotiations with them. To date, Mr. Adams has not contacted me to inform me of what progress, if any, he made regarding these potential tower sights for CWA's Cambridge facility.

6. During my conversations with Mr. Adams he never suggested that CWA had any intentions of changing the community of license for Channel 232A from Cambridge to St. Michaels or to any other community. In fact, in our most recent conversation which occurred in August of 1992, Mr. Adams implied that CWA still was pursuing the construction of a Cambridge FM facility.

7. In preparation of Prettyman's comments in response to the Notice of Proposed Rule Making proposing the reallocation of Channel 232A from Cambridge to St. Michaels, Maryland, I performed an engineering analysis of the stations providing city-grade service (i.e., the predicted 3.16 mV/m contour for FM

stations and the predicted 5 mV/m for the AM stations encompassing the city) to the communities of Cambridge and St. Michaels respectively. Attached hereto, as Attachment A, is the result of my analysis.

8. As shown by Attachment A, a total of eight stations (5 FM stations and 3 AM stations) provide city-grade coverage to St. Michaels whereas only 4 stations (3 FM stations and 1 AM stations) provide city-grade coverage to Cambridge. It also should be noted that two of these four stations (1 FM station and 1 AM station) are licensed to Cambridge. A comparison of the amount of city-grade service received by the residents of St. Michaels with that received by the residents of Cambridge indicates that St. Michaels is a well-served area receiving city-grade coverage from a greater number of broadcast sources than Cambridge.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on February 3, 1993.


Thomas Ringer

ATTACHMENT A

ENGINEERING ANALYSIS

Full Service Commercial Stations Providing City-Grade Coverage

A. St. Michaels, Maryland

<u>Call Sign</u>	<u>Community of License</u>	<u>Frequency of Operation</u>
WCEM-FM	Cambridge, Maryland	106.3 MHz
WCEI-FM	Easton, Maryland	96.7 MHz
WANN(AM)	Annapolis, Maryland	1190 kHz
WXZL-FM	Grasonville, Maryland	
WHFS(FM)	Annapolis, Maryland	99.1 MHz
WFSI(FM)	Annapolis, Maryland	107.9 MHz
WNAV-AM	Annapolis, Maryland	1430 MHz
WCEI-AM	Easton, Maryland	1460 kHz

B. Cambridge, Maryland

<u>Call Sign</u>	<u>Community of License</u>	<u>Frequency of Operation</u>
WCEM-FM	Cambridge, Maryland	106.3 MHz
WAAI(FM)	Hurlock, Maryland	100.9 MHz
WCEI-FM	Easton, Maryland	96.7 MHz
WCEM(AM)	Cambridge, Maryland	1240 kHz

CERTIFICATE OF SERVICE

I, Lisa Saunders, hereby certify that copies of the foregoing "COMMENTS OF PRETTYMAN BROADCASTING COMPANY" were sent February 4, 1993, via First Class, United States mail, postage prepaid, to the following:

* Mr. Michael Ruger
Chief, FM Allocations Branch
Federal Communications Commission
2025 M Street, N.W., Room 8322
Washington, D.C. 20554

Mr. Charles W. Adams, Jr.
C.W.A Broadcasting, Inc.
35 Solomons Island Road
Annapolis, Maryland 21401



Lisa Saunders

* Denotes Hand Delivery